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AO 106 (Rev. 04/10) Application for a Search Warrant

JUL 31 2018

UNITED STATES DISTRICT COURT

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTYfor the
Western District of WashingtonIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)A Facebook account, identified as
account 100003841782510

Case No. MJ18-068

AMENDED APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, attached hereto and incorporated by reference.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
 18 U.S.C. § 1591
 18 U.S.C. § 1594
 18 U.S.C. § 1956

Offense Description
 Sex Trafficking of a Minor or Sex Trafficking through Force, Fraud and Coercion
 Conspiracy to Engage in Sex Trafficking of a Minor or Force, Fraud and Coercion
 Laundering of Monetary Instruments

The application is based on these facts:

See Affidavit of FBI Special Agent Steven Vienneau, attached hereto and incorporated herein by reference.

- ☒ Continued on the attached sheet.
☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

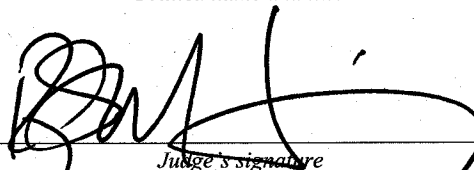

 Applicant's signature

Steven Vienneau, Special Agent, FBI
 Printed name and title

Sworn to before me and signed in my presence.

Date: July 31, 2018

City and state: Seattle, Washington


 Judge's signature

Chief United States District Judge Ricardo S. Martinez
 Printed name and title

ATTACHMENT A

ACCOUNTS TO BE SEARCHED

This warrant applies to information associated with the Facebook user Facebook account 100003841782510("SUBJECT ACCOUNT") that is stored at premises owned, maintained, controlled, or operated by Facebook, a company headquartered in Menlo Park, California.

ATTACHMENT B**I. Information to be disclosed by Facebook**

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each SUBJECT ACCOUNT listed in Attachment A:

a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;

b. All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them;

d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

e. All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;

f. All "check ins" and other location information;

g. All IP logs, including all records of the IP addresses that logged into the account;

- h. All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- i. All past and present lists of friends created by the account;
- j. All records of Facebook searches performed by the account;
- k. The length of service (including start date), the types of service utilized by the user, and the means and source of any payments associated with the service (including any credit card or bank account number);
- l. All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- m. All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.
- n. A list of any accounts linked to the SUBJECT ACCOUNT by machine cookie.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Section 1591 (Sex Trafficking of a Juvenile or Through Force, Fraud, and Coercion); Title 18, United States Code, Section 1594(b) (Conspiracy to Engage in Sex Trafficking of a Juvenile or Through Force, Fraud, and Coercion), and Title 18, United States Code, Section 1956 (Laundering of Monetary Instruments) , occurring between October 2011 and February 2017, including the following:

- a. Evidence that AUBREY TAYLOR or his co-conspirators are involved in prostitution, sex trafficking, money laundering, or witness intimidation or witness tampering;
- b. Evidence regarding the proceeds of the enumerated offense

1 c. IP log evidence, including all records of the IP addresses that logged into
2 the account, and the dates and times such logins occurred, suggesting that AUBREY
3 TAYLOR traveled within or outside the Western District of Washington to conduct
4 prostitution or sex trafficking;

5 d. Evidence suggesting that AUBREY TAYLOR or his conconspirators
6 traveled within or outside the Western District of Washington to conduct prostitution or
7 sex trafficking;

8 e. Evidence that AUBREY TAYLOR or his co-conspirators used Facebook to
9 recruit individuals to prostitute for him, or to intimidate or tamper with victims or
10 potential witnesses;

11 f. Evidence of the identities of and relationships between co-conspirators;

12 g. Evidence of who uses or accesses the subject account or who exercises in
13 any way any dominion or control over the account;

14 h. Evidence of who communicated with the SUBJECT ACCOUNT, including
15 records about their identities and whereabouts.

16 i. Log records, including IP address captures, associated with the specified
17 account;

18 j. Subscriber records associated with the specified accounts, including
19 1) names, email addresses, and screen names; 2) physical addresses; 3) records of session
20 times and durations; 4) length of service (including start date) and types of services
21 utilized; 5) telephone or instrument number or other subscriber number or identity,
22 including any temporarily assigned network address such as internet protocol address,
23 media access card addresses, or any other unique device identifiers recorded by Google in
24 relation to the accounts; 6) account log files (login IP address, account activation IP
25 addresses, and IP address history); 7) detailed billing records/logs; 8) means and source
26 of payment; and 9) lists of all related accounts;

27 k. Records of communications between Facebook and any person purporting
28 to be the account holder about issues relating to the accounts, such as technical problems,

1 | billing inquiries, or complaints from other users about the specified account. This to
2 | include records of contacts between the subscriber and the provider's support services, as
3 | well as records of any actions taken by the provider or subscriber as a result of the
4 | communications.

5 | 1. Information identifying accounts that are linked or associated with the
6 | SUBJECT ACCOUNT.

1 zero. The purpose of this application is to correct the scrivener's error on the February
2 16, 2018 Search Warrant and to seek a warrant authorizing the search of Facebook
3 account 100003841782510 belonging to AUBREY TAYLOR (hereinafter the
4 "SUBJECT ACCOUNT") for evidence, fruits, and instrumentalities of the crime of Sex
5 Trafficking of a Juvenile or through Force, Fraud, and Coercion, in violation of Title 18,
6 United States Code, Section 1591.

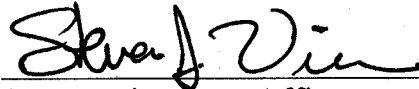
7 4. Based on my training and experience, and the facts set forth in the Affidavit
8 included in Exhibit 1, I believe there is probable cause that evidence, fruits, and
9 instrumentalities of violations of Title 18, United States Code, Section 1591 (Sex
10 Trafficking of Minors or through Force, Fraud, and Coercion) will be found in the
11 SUBJECT ACCOUNT, as more fully described in Attachment A to this Affidavit. I
12 therefore request that the Court issue the corrected search warrant. This Court has
13 jurisdiction to issue the requested warrant because it is "a court of competent
14 jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) &
15 (c)(1)(A). Specifically, the Court is "a district court of the United States . . . that - has
16 jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i). Pursuant to
17 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the
18 service or execution of this warrant. Accordingly, by this Affidavit and Warrant I seek
19 authority for the government to search all of the items specified in Section I, Attachment

20 //

21 //

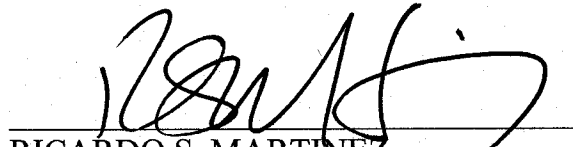
1 B to the Warrant, and specifically to seize all of the data, documents and records that are
2 identified in Section II to that same Attachment.

3
4 Dated this 31st day of July, 2018.

5 

6 Steven Vienneau, Affiant
7 Special Agent
8 Federal Bureau of Investigation

9 SUBSCRIBED and SWORN to before me this 31 day of July,
10 2018.

11 

12 RICARDO S. MARTINEZ
13 Chief United States District Judge
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Exhibit 1

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the
Northern District of CaliforniaIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)A Facebook account, identified as
account 10003841782510

Case No.

m718-068

CERTIFIED TRUE COPY
ATTEST: WILLIAM M. MCCOOL
Clerk, U.S. District Court
Western District of Washington
Emily Neale
Deputy Clerk

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Northern District of California
(identify the person or describe the property to be searched and give its location):

See Attachment A, attached hereto and incorporated by reference.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated herein by reference.

YOU ARE COMMANDED to execute this warrant on or before March 2, 2018 (not to exceed 14 days)
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to any U.S. Magistrate Judge in West. Dist. of Washington.
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .

Date and time issued:

Feb 16, 2018
11:17 AM

Judge's signature

City and state:

Seattle, Washington

Mary Alice Theiler, United States Magistrate Judge

Printed name and title

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

ATTACHMENT A

ACCOUNTS TO BE SEARCHED

This warrant applies to information associated with the Facebook user Facebook account 10003841782510 ("SUBJECT ACCOUNT") that is stored at premises owned, maintained, controlled, or operated by Facebook, a company headquartered in Menlo Park, California.

ATTACHMENT B

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each SUBJECT ACCOUNT listed in Attachment A:

- a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;
- b. All activity logs for the account and all other documents showing the user's posts and other Facebook activities;
- c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them;
- d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;
- e. All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;
- f. All "check ins" and other location information;

- g. All IP logs, including all records of the IP addresses that logged into the account;
- h. All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- i. All past and present lists of friends created by the account;
- j. All records of Facebook searches performed by the account;
- k. The length of service (including start date), the types of service utilized by the user, and the means and source of any payments associated with the service (including any credit card or bank account number);
- l. All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- m. All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.
- n. A list of any accounts linked to the SUBJECT ACCOUNT by machine cookie.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Section 1591 (Sex Trafficking of a Juvenile or Through Force, Fraud, and Coercion), including the following:

- a. Any and all Wall Posts, Timeline Posts, private messages, status updates, chat history, friend requests, or other information suggesting that AUBREY TAYLOR is involved in prostitution, sex trafficking, or witness intimidation or witness tampering;

- b. Any and all photographs, including photographs posted by AUBREY TAYLOR or by other persons, suggesting that AUBREY TAYLOR is involved in prostitution, sex trafficking, or witness intimidation or witness tampering;
- c. Any and all IP logs, including all records of the IP addresses that logged into the account, and the dates and times such logins occurred, suggesting that AUBREY TAYLOR traveled within or outside the Western District of Washington to conduct prostitution or sex trafficking;
- d. Any and all photographs, including photographs posted by AUBREY TAYLOR or by other persons, suggesting that AUBREY TAYLOR traveled within or outside the Western District of Washington to conduct prostitution or sex trafficking; and
- e. Any and all Wall Posts, Timeline posts, private messages, status updates, chat history, friend requests, or other information, and any and all photographs, including photographs posted by AUBREY TAYLOR or other persons, suggesting that AUBREY TAYLOR used Facebook to recruit individuals to prostitute for him, or to intimidate or tamper with victims or potential witnesses; and
- f. Records relating to who created, used, or communicated with the SUBJECT ACCOUNT, including records about their identities and whereabouts.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Facebook, and my official title is _____. I am a custodian of records for Facebook. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Facebook, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Facebook; and
- c. such records were made by Facebook as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

AO 106 (Rev. 04/10) Application for a Search Warrant

FEB 16 2018

UNITED STATES DISTRICT COURT

for the
Northern District of California

BY

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)A Facebook account, identified as
account 10003841782510

Case No.

MJ18-068

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, attached hereto and incorporated by reference.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U.S.C. § 1591

Offense Description
Sex Trafficking of a Minor or Sex Trafficking through Force, Fraud and Coercion

The application is based on these facts:

See Affidavit of FBI Special Agent Sara Blond, attached hereto and incorporated herein by reference.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



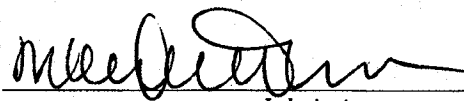
Applicant's signature

Sara Blond, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/16/2018



Judge's signature

City and state: Seattle, Washington

Mary Alice Theiler, United States Magistrate Judge

Printed name and title

AFFIDAVIT OF SARA K. BLOND

1
2 STATE OF WASHINGTON)
3) ss
4 COUNTY OF KING)

5 I, Sara K. Blond, a Special Agent with the Federal Bureau of Investigation, Seattle,
6 Washington, having been duly sworn, state as follows:

AFFIANT BACKGROUND

8 1. I am a Special Agent with the Federal Bureau of Investigation (FBI),
9 currently assigned to the Seattle Division. I have been employed as an FBI Special Agent
10 since 2009. I am responsible for investigations involving Violent Crimes Against
11 Children, which includes sex trafficking of minors, occurring in the Western District of
12 Washington.

13 2. My duties as a Special Agent include the enforcement of federal criminal
14 statutes involving the sexual exploitation of children pursuant to Title 18, United States
15 Code, Sections 2251 through 2259, and Sections 1591 through 1592. While employed by
16 the FBI, I have led numerous investigations in conjunction with the FBI's Innocent
17 Images National Initiative and the FBI's Innocence Lost National Initiative. I have
18 received specialized training in the area of the production, importation, and distribution
19 of child pornography, and have had the opportunity to observe and review thousands of
20 examples of child pornography in many forms of media, including video and computer
21 media. I have also received specialized training relative to sex trafficking of minors,
22 which includes the cycle of enticement, recruitment, and coercion of children by sex
23 traffickers. I have participated in the execution of many search warrants involving child
24 exploitation and/or child pornography offenses and the search and seizure of computers
25 and other digital devices. Further, I have served as the affiant on numerous search
26 warrants and complaints relating to child exploitation investigations.

27
28 BLOND AFFIDAVIT (Facebook) /USAO 2015R01233
UNITED STATES v. TAYLOR/CR16-300 RSL - 1

UNITED STATES ATTORNEY
700 STEWART ST., SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 3. The facts set forth in this Affidavit are based on my own personal
2 knowledge; knowledge obtained from other individuals during my participation in this
3 investigation, including other law enforcement officers; review of documents and records
4 related to this investigation; communications with others who have personal knowledge
5 of the events and circumstances described herein; and information gained through my
6 training and experience.

7 **INTRODUCTION AND PURPOSE OF AFFIDAVIT**

8 4. I am submitting this affidavit in support of an application under Rule 41 of
9 the Federal Rules of Criminal Procedure for a warrant for **Facebook account**
10 **10003841782510** (hereafter referenced as "SUBJECT ACCOUNT").

11 5. The above Facebook user ID identify a Facebook account stored at
12 premises owned, maintained, controlled, or operated by Facebook, a social networking
13 company headquartered in Menlo Park, California. The information to be searched is
14 described in the following paragraphs and in Attachment A. This affidavit is made in
15 support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A)
16 and 2703(c)(1)(A) to require Facebook to disclose to the government copies of the
17 information (including the content of communications) further described in Section I of
18 Attachment B. Upon receipt of the information described in Section I of Attachment B,
19 government-authorized persons will review that information to locate the items described
20 in Section II of Attachment B.

21 6. The facts in this affidavit come from my personal observations, my training
22 and experience, and information obtained from other agents, FBI computer scientists,
23 other law enforcement personnel, and witnesses. This affidavit is intended to show
24 merely that there is sufficient probable cause for the requested warrant and does not set
25 forth all of my knowledge about this matter.

26 7. Based on my training and experience and the facts as set forth in this
27 affidavit, there is probable cause to believe that violations of Title 18, United States

1 Code, Section 1591 (Sex Trafficking of a Juvenile or Through Force, Fraud, and
2 Coercion) have been committed by known and unknown persons. There is also probable
3 cause to search the information described in Attachment A for evidence,
4 instrumentalities, contraband or fruits of these crimes, as described in Attachment B.

5
6 **SUMMARY OF PROBABLE CAUSE**

7 8. On or about October 19, 2014, a seventeen-year-old female, hereinafter
8 referred to as Juvenile Female 1 (JF1), was reported as a missing juvenile to the
9 Bellingham Police Department. During the subsequent police investigation, investigators
10 learned that JF1 had sent text messages to her sister indicating that she was being held
11 against her will. JF1's family provided screenshots of text messages to the Bellingham
12 Police Department, including a text from JF1 in which she stated: "Someone will find me
13 hopefully. Raped, beaten. And working my job." Law enforcement officers learned that
14 the Internet Protocol (IP) address used to send the messages resolved to the LaQuinta Inn
15 in Wenatchee, Washington.

16 9. On October 30, 2014, Wenatchee Police Department officers located JF1 at
17 the LaQuinta Inn in Wenatchee. JF1 was in the company of an adult female, identified as
18 A.M. At the time, the motel clerk told investigators that JF1 had been seen the previous
19 day with a black male. Law enforcement officers learned that A.M. had been contacted a
20 week earlier at another Wenatchee area motel after the hotel clerk reported suspicious
21 activity and a high number of visitors to a hotel room rented to TAYLOR. Wenatchee
22 Police Department officers questioned JF1, who at that time denied being held against her
23 will or being forced into sex trafficking. She also was asked about the text messages she
24 had sent, and said she had been held against her will in Bellingham when she initially ran
25 away, but she had gotten away and was now just hanging out with friends.

26 10. JF1 was subsequently interviewed on several different occasions by law
27 enforcement. During these interviews, she provided the following information: JF1

1 advised that earlier that month, she was in Seattle when she was approached by a black
2 male who identified himself as "La'Sear" and "C-Note. JF1 described "C-Note" as a
3 twenty-five-year old black male who drove an old white police car with blue rims.
4 "C-Note" and JF1 spent the night together at a motel in Kent, Washington. The
5 following day, "C-Note" told JF1 that he was ready for her to make money for him.
6 When JF1 asked how, he told her he was going to send her with his brother to make
7 money. JF1 was later shown a photo montage and positively identified CARL TAYLOR
8 as the subject she knew as "C-Note."

9 11. JF1 said that CARL TAYLOR then introduced her to his brother, whom he
10 called "Uno," and Uno's girlfriend. JF1 described "Uno" as a twenty-eight year old
11 black male and believed his true name to be TAYLOR. She described "Uno's" girlfriend
12 as a twenty-three year heavy set white female, with blonde hair, who uses the fictitious
13 name "Sydney" in her online escort advertisements. JF1 was later shown photo montages
14 and identified AUBREY TAYLOR (hereinafter "TAYLOR") as the subject she knew as
15 "Uno," and A.M. as "Uno's" girlfriend.

16 12. JF1 stated that after CARL TAYLOR introduced her to TAYLOR and
17 A.M., he instructed JF1 to get in the car with them. TAYLOR and A.M. drove JF1 to
18 Wenatchee, stopping to purchase a forty-pack of condoms before renting a hotel room.
19 During this trip to Wenatchee, when A.M. was driving the car, TAYLOR got in the back
20 seat of the car with JF1 and told her that she had to perform oral sex on him. JF1
21 protested and said that she did not want to do that. TAYLOR told her that she needed to
22 do it, and he grabbed her head and forced her to perform oral sex.

23 13. Upon arriving in Wenatchee, TAYLOR, A.M., and JF1 spent the night in a
24 hotel room. The next day, A.M. created prostitution advertisements for JF1 on the
25 website Backpage.com and asked JF1 what she wanted her "name" to be. By way of
26 background, the website Backpage.com is an Internet-based website featuring classified
27 advertising. At the time of the investigation, Backpage.com's adult entertainment section

1 contained advertising for prostitution-related services. The website contained listings
2 that are explicitly for sex.

3 14. JF1 was not familiar with the website Backpage.com and still did not
4 understand how she was going to make money, but chose the name "Lydia." A.M. used
5 fake photographs from the Internet to create a prostitution advertisement for JF1 using
6 the name "Lydia." Accordingly to JF1, once A.M.'s advertisement was posted to the
7 Backpage.com website, TAYLOR and A.M. began receiving calls and text messages on
8 their cellular telephones. A.M. soon informed JF1 that she had a "date." JF1 was
9 confused because she did not know anyone in the area and did not understand what A.M.
10 meant when she said she was going on a "date." Both TAYLOR and A.M. told JF1 that
11 she was going to earn money by going on "dates" and people would pay her to have sex.
12 A.M. further explained to JF1 that working as a prostitute would show CARL TAYLOR
13 she loved him. TAYLOR and A.M. instructed JF1 on what to do with the customers,
14 how much money to charge them, and the rules she had to follow, including always
15 wearing a condom. After the prostitution "date," JF1 was required to immediately give
16 her earnings to TAYLOR or A.M. According to JF1, A.M. communicated with the
17 potential customers and told JF1 when a customer would be arriving at the motel room.

18 15. JF1 estimated performing sex acts in exchange for money with between
19 fifteen and twenty male clients. JF1 told investigators there were many "back-to-back"
20 dates in which there was no break between customers. JF1 told the investigators she
21 often went two days without sleep, and did not eat for an entire day on several occasions
22 due to the volume of customers. JF1 did not get to keep any of the money she earned
23 from commercial sex acts but was required to give all of her earnings to TAYLOR or
24 A.M. During this time, A.M. also engaged in prostitution, using the name "Sydney," on
25 her Backpage.com advertisements. According to JF1, TAYLOR did not allow A.M. to
26 keep any of her commercial sex earnings because he was A.M.'s pimp.

1 16. JF1 reported an incident in which TAYLOR was contacted by law
2 enforcement at a hotel. TAYLOR was asked about the traffic to and from his motel
3 room, drugs, and the female he was with. JF1 said that after this incident, she, TAYLOR,
4 and A.M. traveled to Tri-Cities area before returning to Seattle. I am aware from
5 reviewing law enforcement reports that on October 23, 2014, law enforcement officers
6 responded to the Best Western in Wenatchee after an employee reported suspected drug
7 activity in TAYLOR'S room. Both TAYLOR and A.M. were contacted by officers
8 during this incident.

9 17. JF1 said that upon returning from Seattle, TAYLOR and A.M. dropped JF1
10 off with CARL TAYLOR. JF1 stayed with CARL TAYLOR at the Kent motel. The
11 following day, JF1 returned to Wenatchee with A.M. to continue earning money through
12 prostitution. TAYLOR stayed at a motel in Kent, Washington, and later met up with
13 A.M. and JF1 in Wenatchee.

14 18. Based upon the information provided by JF1, law enforcement officers
15 located prostitution advertisements on Backpage.com that had been posted in October
16 2014 for someone named "Lydia." The advertisements featured photographs consistent
17 with the descriptions provided by JF1. The first advertisement was posted in
18 Backpage.com's adult services section for Wenatchee, Washington, on October 22, 2014
19 at 12:33 a.m. Advertisements were then posted on Backpage.com for the Tri-Cities area,
20 and then for Seattle, before being posted for Wenatchee. The final advertisement was
21 posted for Wenatchee on October 30, 2014, the same day JF1 was located by law
22 enforcement in Wenatchee. Law enforcement officers also located advertisements
23 featuring a photograph of A.M. under the name "Sydney." These ads were consistent
24 with the "Lydia" advertisements and the travels described by JF1. Advertisements
25 featuring a photograph of A.M. were posted on Backpage.com's adult services section for
26 Wenatchee on October 21 and 22, 2014. The next advertisement was posted for the Tri-
27 Cities area on October 23, after the above-mentioned law enforcement contact in

1 Wenatchee. Advertisements for A.M. were then posted for Backpage.com's Seattle
2 board on October 25 and 26 and then on the Wenatchee board from October 27 through
3 October 30. Following JF1's recovery on October 30, the next advertisement for A.M.
4 was posted on November 1, 2014, in Backpage.com's adult services section for the Tri-
5 Cities.

6 19. In November 2014, law enforcement located a Facebook profile with the
7 user name listed as "Aubrey Taylor." Your affiant has reviewed screenshots, taken in
8 November 2014, from this publicly accessible Facebook profile. The profile photograph
9 depicts TAYLOR. There are several postings associated with this profile, which state
10 and display the following:

11 a. A montage of photographs depicting hotel room furniture, with the
12 text, "IF SHE TAKES SELFIES IN ANY OF THE FOLLOWING, SHE SELLS
13 PUSSY." TAYLOR added the caption, "Ok this my last one of the morning, to you
14 square ass niggas this post can be the difference between you knocking a bitch who is
15 really feeling you oppose to a bitch who is out to peel your muffin cap back lmpao." It is
16 known to me that a "knock" is a pimp who takes a female prostitute from another pimp,
17 and the phrase "lmpao" is an abbreviation for "laughing my pimp ass off."

18 b. A photograph of a news anchor with the text, "That nigga you with
19 is not a pimp! Boyfriends everywhere are lying to these hoes!" TAYLOR added the
20 caption, "Lmpao this was the breaking news on a real ones news channel this morning."
21 I am aware, based upon my training and experience, that the word "hoes" is a colloquial
22 reference to prostitute.

23 c. A photograph of a black male wearing a striped polo shirt, using his
24 cellular phone, with the text, "How simpin look when he already gave up the dick and the
25 bitch ain't been answering the phone to get down." TAYLOR added the caption, "Good
26 morning to all the Simps fuckin up the game for a real one....." It is known to me that
27

1 “simp” is slang for a man perceived to be subservient to woman, and a “real one” is slang
2 for a pimp.

3 d. A montage of photographs of TAYLOR, as well as a female
4 subsequently identified as D.K., described in greater detail below, titled: “I’ll sell a f*ck
5 before I give one.”

6 e. On June 1, 2014, “Aubrey Taylor” commented “I swear to god my
7 nigga Sea Daddie be in hot pursuit of a prostitute 7 days a week and twice as much on
8 Sunday just like me Impao. I’m at these hoes in person, through third party, internet,
9 telephone, smoke signals and satellite I don’t give a fuck I trying to keep myself in the
10 position to be chosen . . .” Based upon my knowledge and experience investigating sex
11 trafficking cases, I interpret this comment to indicate that “Aubrey Taylor” is using many
12 different methods to recruit and be “chosen” by prostitutes by many different methods,
13 including other people, the internet, and phone conversations.

14 f. On June 14, 2014, “Aubrey Taylor” posted on his wall a meme from
15 www.pimpthoughts.biz that stated “My old hoes be like . . . damn he got back on his feet
16 and doin good. I shudda stayed down wit him.” “Aubrey Taylor” then commented on
17 this post, stating “I should put you bitches on blast.”

18 20. In October 2015, law enforcement officers participating in a multi-agency
19 operation located a prostitution advertisement on Backpage.com for someone who
20 identified herself as “Syd.” Undercover officers called the number listed on the
21 advertisement and made contact with “Syd.” “Syd” agreed to meet at a local hotel in
22 Issaquah, Washington. A.M. came to the hotel in response to the undercover officer’s
23 call and was arrested after making an offer and agreement with the undercover officer to
24 perform sex in exchange for cash.

25 21. After using a law enforcement database, law enforcement learned about the
26 October 2014 incident in Wenatchee involving A.M., TAYLOR, and JF1, law
27 enforcement interviewed A.M. In response to questions from law enforcement, A.M.

1 stated that she and TAYLOR have been together "on and off" since 2011. A.M. said that
2 she and TAYLOR are no longer together but continue to communicate by telephone.
3 When asked about JF1, A.M. referred to JF1 as a "bitch" and said that JF1 had lied to her
4 [A.M.] about her age.

5 22. A.M. consented to a download search of her cellular telephone. A review
6 of A.M.'s cell phone download revealed that JF1 was listed in A.M.'s contacts by first
7 and last name. The cell phone number listed on JF1's Backpage.com advertisements was
8 listed in the contacts under the name "Tashiana." Law enforcement had received
9 information that a woman with the first name Tashiana was the mother of AUBREY'S
10 TAYLOR'S child. A search of the cell phone also revealed numerous contacts
11 referencing the name "Lydia," along with dollar amounts and descriptions or details of
12 suspected customers. The contacts also used "Wen," which is a potential abbreviation
13 for Wenatchee. Several examples of these contacts are as follows: "\$400 Lydia Wen 2
14 Whole Hrs," "\$100 Lydia Wen Come Back 4 More," "\$80 Lydia Wen Mexi Behind
15 Car," and "\$500 Lydia Wen Australia." Your affiant aware, based upon my training and
16 experience, that these types of notations and contact information are consistent with the
17 way that prostitutes and pimps keep track of commercial sex customers, their phone
18 numbers, and other information, to include race, sexual acts or fetishes, dollar amounts,
19 location and employment. Other contacts had similar titles for "Syd," which is an
20 abbreviation for Sydney.

21 23. A.M.'s cellular telephone had three contacts for TAYLOR. These contacts
22 included his cellular telephone number, previous addresses, email addresses, and family
23 member names. The number 206-XXX-5083 is listed in A.M.'s cellular telephone
24 contacts under the name "Aubrey Veechee Taylor."

25 24. I reviewed text messages on A.M.'s cellular telephone occurring between
26 October 22, 2014, through October 9, 2015. In the text messages, A.M. makes
27 statements indicating that she was present in Wenatchee on October 28, 2014.

1 25. I also reviewed text messages between A.M. and numbers associated with
2 TAYLOR. The texts provide details of their prostitution-related activities, including
3 posting advertisements online, prices for specific sex acts, motel and travel information,
4 identification of other women who were working as prostitutes for TAYLOR, and
5 TAYLOR's collection of prostitution proceeds. In the text exchanges, TAYLOR
6 provides instructions to A.M. on posting advertisements (for herself and others), assists in
7 managing other prostitutes, travel destinations in Washington and Idaho, and
8 transportation to "dates."

9 26. Throughout the series of text messages between A.M. and TAYLOR,
10 TAYLOR repeatedly refers to himself as a "pimp" and discusses his "recipe" of pimping.
11 He refers to A.M. as a "bottom." Based upon my training and experience, I am aware
12 that pimps often use an experienced or primary prostitute, often referred to as a "bottom,"
13 who is responsible for training, managing, and monitoring the pimp's other prostitutes.
14 In the text messages between TAYLOR and A.M., TAYLOR complains that A.M. is not
15 doing her "bottom" job properly. He accuses A.M. of running off "bitches," leading to a
16 loss of income. In a set of text messages from December 2014, TAYLOR instructs A.M.
17 to take a group of girls to Wenatchee and states that he will take another group to
18 Yakima. TAYLOR and A.M. have text messages which discuss A.M. posting
19 advertisements for the other females. Later, TAYLOR inquires of A.M. how much
20 money she made in Wenatchee and A.M. provides an earnings report. TAYLOR further
21 instructs A.M. to collect money from other girls who are "working" (prostituting).

22 27. In a November 30, 2014 text exchange between A.M. and TAYLOR, A.M.
23 wrote "I took that underage bitch out of town so you and tashiana had a room to stay at
24 and spend time together and I didn't care I didn't say anything I was my idea that way
25 money could still be made." This message is consistent with JF1's statement of going to
26 Wenatchee with A.M. while AUBREY remained at a motel in Kent.

1 28. On December 8, 2015, TAYLOR was arrested on outstanding warrants.
2 TAYLOR's cellular phone, a black Samsung Galaxy S5 was seized by police at the time
3 of his arrest. It was secured into evidence at the Kent Police Department, and later
4 transferred to the FBI Seattle's evidence control center.

5 29. On or about May 4, 2016, a federal arrest warrant was issued by the United
6 States District Court, Western District of Washington, authorizing the arrest of TAYLOR
7 for violations of Title 18, United States Code, Section 1591(a)(1) and (b)(2).

8 30. On February 3, 2017, I applied for and obtained a warrant to search the
9 contents of the Samsung Galaxy S5 that was seized at the time of TAYLOR's
10 December 8, 2015 arrest. Pursuant to the search warrant, a forensic examination of the
11 Samsung Galaxy S5 (hereinafter "the Galaxy S5") was subsequently completed. I
12 reviewed the forensic extraction of the Galaxy S5, and based upon the data I reviewed, I
13 concluded that this cell phone had been used by TAYLOR. In addition, the Galaxy S5
14 had the SUBJECT ACCOUNT installed through the Facebook mobile application. There
15 were 131 Facebook messages associated with the SUBJECT ACCOUNT that were
16 recovered during the forensic extraction.

17 31. One conversation occurred on December 8, 2015, between the SUBJECT
18 ACCOUNT and A.B., who was identified as a woman who formerly worked as a
19 prostitute for Taylor. During this conversation, A.B. asked TAYLOR, "boy wtf could
20 you possibly want." TAYLOR responded, "Lol I just sent you a friend request i didn't
21 message you so you can feel free to get back to the money ok." A.B. responded, "My
22 empires already built so watch me sit here on my thrown [sic] and laugh at ya ass." I
23 believe "get back to the money" is TAYLOR's reference to A.B. working for him as a
24 prostitute. I believe her response of "my empires already built" is her resistance to
25 wanting TAYLOR as a pimp.

26 32. In April of 2014, prior to TAYLOR's contact with JF1, TAYLOR was
27 under investigation by the Auburn Police Department for Promoting Prostitution.

1 Following the arrest of TAYLOR, detectives with Auburn Police Department obtained a
2 search warrant for TAYLOR's vehicle, in which they found a Samsung Galaxy S3
3 cellular phone. A forensic examination was conducted for the Samsung Galaxy S3. The
4 extraction shows 87 Facebook chats that occurred between the SUBJECT ACCOUNT
5 and numerous woman. I read these messages, which appear to be attempts by TAYLOR
6 to recruit women into prostitution:

7 a. On April 7, 2014, TAYLOR is engaged in a chat conversation with a
8 woman. Amidst asking if she is single, the woman asks TAYLOR for a "donation."
9 TAYLOR responds: "I'm in a position to make all kinds of donations but I aint no trick if
10 that's where you're going with this ma?????" It is known to me that "trick" is an
11 expression used to describe men who pay prostitutes for sex.

12 b. On March 15, 2014, TAYLOR asks a woman, "Do you love
13 accumulating money?" She responds, "Yea why." In response, TAYLOR wrote,
14 "Because I've been admiring your beauty from a distance for about 2 weeks and I think
15 that if I had a woman as strikingly beautiful as you in my corner that we could
16 accomplish an endless amount of things together, I don't wanna use in no way shape or
17 form I'm just trying to count some racks with you and enjoy life. Do you have a special
18 person of interest in your life or are you single and open to the idea of meeting somebody
19 new." It is known to me that "racks" is an expression used by pimps to describe money.

20 c. On June 27, 2012, TAYLOR was engaged in conversation with a
21 woman he was acquainted with. The woman asks him about an individual law
22 enforcement later identified as having been trafficking by TAYLOR: "Last I heard of u...
23 u was with [T.C.]. Is that long done?" TAYLOR responded, "Yea dat bitch been fired".
24 I believe the expression "fired" indicates T.C. no longer worked as a prostitute for
25 TAYLOR.

26 33. On or about February 28, 2017, law enforcement interviewed A.M. A.M.
27 disclosed working as a prostitute for TAYLOR. A.M. further stated she recalled

1 TAYLOR used Facebook, and other social media sites, to recruit women into
2 prostitution. A.M. disclosed she was subjected to physical violence from TAYLOR, and
3 that this violence had occurred for many years.

4 34. In March 2017, law enforcement interviewed D.K. In the course of these
5 interviews, D.K. stated that her relationship with TAYLOR began when he sent her
6 flattering messages on Facebook. (D.K. also stated that years earlier, TAYLOR had sent
7 text messages to a number she had listed on a Backpage.com prostitution advertisement,
8 but she did not respond to him.) D.K. stated that she and TAYLOR began dating after he
9 sent her a message on Facebook, and that soon after that, he began recruiting her to work
10 for him as a prostitute. D.K. was aware of another woman who TAYLOR physically
11 assaulted, but did not recall her name. D.K. said that she saw conversations regarding
12 these acts of violence, which occurred between TAYLOR and the woman, in TAYLOR's
13 Facebook messenger. D.K. also recalled TAYLOR's Facebook profile contained the
14 name "Young Uno."

15 35. On August 10, 2017, A.M. told law enforcement that TAYLOR had
16 communicated with victim L.C. through Facebook. A.M. said that as a result of their
17 correspondence on Facebook, L.C. eventually began working for TAYLOR as a
18 prostitute in exchange for drugs.

19 36. Law enforcement later interviewed L.C. L.C. stated that she had known
20 TAYLOR for a long time, but that they had reconnected either through text message or
21 through Facebook messenger. L.C. disclosed that while she was addicted to heroin,
22 TAYLOR recruited her to work for him as a prostitute. According to L.C., TAYLOR
23 told her that he would provide her with heroin daily if she would work as a prostitute and
24 provide him with her earnings.

25 37. In my review of the forensic extraction of TAYLOR's Galaxy S5, I found a
26 series of messages, sent from 2012 through 2013, between the SUBJECT ACCOUNT
27 and an account belonging to L.C. In one of these messages, dated October 24, 2013, the

1 | SUBJECT ACCOUNT sends a message to L.C. stating “[w]anna come fuck wit me n
2 | [A.M.] call her 206349[XXXX] n tell u wanna make some money.” Based upon my
3 | training and experience, I am aware that individuals involved in the commercial sex
4 | industry often use the phrases “fuck wit me” and “make some money” to indicate a
5 | person agreeing to work for a pimp as a prostitution and to provide him with her
6 | earnings.

7 | 38. On February 5, 2018, law enforcement interviewed an individual named
8 | S.C. During the course of that interview, S.C. stated that she had worked as a prostitute
9 | for TAYLOR and provided him with all her earnings. S.C. stated that TAYLOR had
10 | recruited her by sending her flattering messages from his Facebook account. S.C. soon
11 | agreed to meet up with TAYLOR, at which point he took her to another city to work for
12 | him as a prostitute.

13 | 39. The SUBJECT ACCOUNT was preserved by Facebook Inc. from March
14 | 30, 2017 through August 27, 2017, when that request expired. The SUBJECT
15 | ACCOUNT was preserved again by Facebook Inc. on January 3, 2018, which is still
16 | active.

17 | **BACKGROUND RELATED TO FACEBOOK SERVICES**

18 | 40. Facebook owns and operates a free-access social networking website of the
19 | same name that can be accessed at <http://www.facebook.com>. Facebook allows its users
20 | to establish accounts with Facebook, and users can then use their accounts to share
21 | written news, photographs, videos, and other information with other Facebook users, and
22 | sometimes with the general public.

23 | 41. Facebook asks users to provide basic contact and personal identifying
24 | information to Facebook, either during the registration process or thereafter. This
25 | information may include the user’s full name, birth date, gender, contact e-mail
26 | addresses, Facebook passwords, Facebook security questions and answers (for password
27 | retrieval), physical address (including city, state, and zip code), telephone numbers,

1 screen names, websites, and other personal identifiers. Facebook also assigns a user
2 identification number to each account. In my training and experience, such information
3 may constitute evidence of the crimes under investigation because the information can be
4 used to identify the account's user or users, to locate them, and to help establish who has
5 dominion and control over the account.

6 42. Facebook users may join one or more groups or networks to connect and
7 interact with other users who are members of the same group or network. Facebook
8 assigns a group identification number to each group. A Facebook user can also connect
9 directly with individual Facebook users by sending each user a "Friend Request." If the
10 recipient of a "Friend Request" accepts the request, then the two users will become
11 "Friends" for purposes of Facebook and can exchange communications or view
12 information about each other. Each Facebook user's account includes a list of that user's
13 "Friends" and a "News Feed," which highlights information about the user's "Friends,"
14 such as profile changes, upcoming events, and birthdays. A Facebook user's groups and
15 friends list may also constitute evidence of the crimes under investigation, because the
16 information can be used to identify the account's user or users and may also assist in
17 identifying co-conspirators.

18 43. Facebook users can select different levels of privacy for the
19 communications and information associated with their Facebook accounts. By adjusting
20 these privacy settings, a Facebook user can make information available only to himself or
21 herself, to particular Facebook users, or to anyone with access to the Internet, including
22 people who are not Facebook users. A Facebook user can also create "lists" of Facebook
23 friends to facilitate the application of these privacy settings. Facebook accounts also
24 include other account settings that users can adjust to control, for example, the types of
25 notifications they receive from Facebook.

26 44. Facebook users can create profiles that include photographs, lists of
27 personal interests, and other information. Facebook users can also post "status" updates

1 about their whereabouts and actions, as well as links to videos, photographs, articles, and
2 other items available elsewhere on the Internet. Facebook users can also post information
3 about upcoming "events," such as social occasions, by listing the event's time, location,
4 host, and guest list. In addition, Facebook users can "check in" to particular locations or
5 add their geographic locations to their Facebook posts, thereby revealing their geographic
6 locations at particular dates and times. A particular user's profile page also includes a
7 "Wall," which is a space where the user and his or her "Friends" can post messages,
8 attachments, photographs and links that will typically be visible to anyone who can view
9 the user's profile (subject to the privacy settings selected by the account user). This type
10 of information may also constitute evidence of the crimes under investigation to the
11 extent this information may help identify the account user and co-conspirators and may
12 also be used to help locate the account user.

13 45. Facebook has a Photos application, where users can upload an unlimited
14 number of albums and photos. Another feature of the Photos application is the ability to
15 "tag" (i.e., label) other Facebook users in a photo or video. When a user is tagged in a
16 photo or video, he or she receives a notification of the tag and a link to see the photo or
17 video. For Facebook's purposes, the photos associated with a user's account will include
18 all photos uploaded by that user that have not been deleted, as well as all photos uploaded
19 by any user that have that user tagged in them.

20 46. Facebook users can exchange private messages on Facebook with other
21 users. These messages, which are similar to e-mail messages, are sent to the recipient's
22 "Inbox" on Facebook, which also stores copies of messages sent by the recipient, as well
23 as other information. Facebook users can also post comments on the Facebook profiles
24 of other users or on their own profiles; such comments are typically associated with a
25 specific posting or item on the profile. In addition, Facebook has a Chat feature known
26 as Facebook messenger that allows users to send and receive instant messages through
27 Facebook. These chat communications are stored in the chat history for the account. The

1 content of a user's Facebook messenger history may contain communications relevant to
2 the crimes under investigation and may also help confirm the identity of the account
3 holder and any co-conspirators. Facebook also has a Video Calling feature, and although
4 Facebook does not record the calls themselves, it does keep records of the date of each
5 call.

6 47. If a Facebook user does not want to interact with another user on Facebook,
7 the first user can "block" the second user from seeing his or her account.

8 48. Facebook has a "like" feature that allows users to give positive feedback or
9 connect to particular pages. Facebook users can "like" Facebook posts or updates, as
10 well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook
11 users can also become "fans" of particular Facebook pages. These likes may constitute
12 evidence of the crimes under investigation to the extent they reveal interest in pimping or
13 prostitution.

14 49. Facebook has a search function that enables its users to search Facebook for
15 keywords, usernames, or pages, among other things.

16 50. Each Facebook account has an activity log, which is a list of the user's
17 posts and other Facebook activities from the inception of the account to the present. The
18 activity log includes stories and photos that the user has been tagged in, as well as
19 connections made through the account, such as "liking" a Facebook page or adding
20 someone as a friend. The activity log is visible to the user but cannot be viewed by
21 people who visit the user's Facebook page.

22 51. In addition to the applications described above, Facebook also provides its
23 users with access to thousands of other applications on the Facebook platform. When a
24 Facebook user accesses or uses one of these applications, an update about that the user's
25 access or use of that application may appear on the user's profile page.

26 52. Facebook uses the term "Neoprint" to describe an expanded view of a given
27 user profile. The "Neoprint" for a given user can include the following information from

1 the user's profile: profile contact information; News Feed information; status updates;
2 links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists,
3 including the friends' Facebook user identification numbers; groups and networks of
4 which the user is a member, including the groups' Facebook group identification
5 numbers; future and past event postings; rejected "Friend" requests; comments; gifts;
6 pokes; tags; and information about the user's access and use of Facebook applications.

7 53. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP
8 address. These logs may contain information about the actions taken by the user ID or IP
9 address on Facebook, including information about the type of action, the date and time of
10 the action, and the user ID and IP address associated with the action. For example, if a
11 user views a Facebook profile, that user's IP log would reflect the fact that the user
12 viewed the profile, and would show when and from what IP address the user did so.

13 54. Social networking providers like Facebook typically retain additional
14 information about their users' accounts, such as information about the length of service
15 (including start date), the types of service utilized, and the means and source of any
16 payments associated with the service (including any credit card or bank account number).
17 In some cases, Facebook users may communicate directly with Facebook about issues
18 relating to their accounts, such as technical problems, billing inquiries, or complaints
19 from other users. Social networking providers like Facebook typically retain records
20 about such communications, including records of contacts between the user and the
21 provider's support services, as well as records of any actions taken by the provider or
22 user as a result of the communications.

23 55. Based upon my training and experience, all of these types of information
24 may be evidence of the crime of Sex Trafficking of a Juvenile or Through Force, Fraud,
25 and Coercion. Stored communications including Facebook messenger chats not only
26 may contain communications relating to crimes, but also help identify and locate the
27 participants in those crimes. Group lists and friend lists may help identify co-

1 conspirators. Similarly, photographs and videos may help identify and locate the account
 2 holder and any co-conspirators. Search and browsing history can also be extremely
 3 useful in identifying those using anonymous online accounts and may also constitute
 4 direct evidence of the crime of sex trafficking to the extent the browsing history or search
 5 history might include searches and browsing history related to prostitution or attempts to
 6 recruit potential victim.

7 56. Therefore, the computers of Facebook are likely to contain all the material
 8 described above, including stored electronic communications and information concerning
 9 subscribers and their use of Facebook, such as account access information, transaction
 10 information, and other account information.

11 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

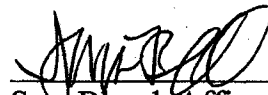
12 57. I anticipate executing this warrant under the Electronic Communications
 13 Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by
 14 using the warrant to require Facebook to disclose to the government copies of the records
 15 and other information (including the content of communications) particularly described in
 16 Section I of Attachment B. Upon receipt of the information described in Section I of
 17 Attachment B, government-authorized persons will review that information to locate the
 18 items described in Section II of Attachment B.
 19

20 **CONCLUSION**

21 58. Based on the foregoing, I believe there is probable cause that evidence,
 22 fruits, and instrumentalities of violations of Title 18, United States Code, Section 1591
 23 (Sex Trafficking of Minors or through Force, Fraud, and Coercion) will be found in the
 24 SUBJECT ACCOUNT, as more fully described in Attachment A to this Affidavit. I
 25 therefore request that the Court issue the proposed search warrant. This Court has
 26 jurisdiction to issue the requested warrant because it is "a court of competent
 27

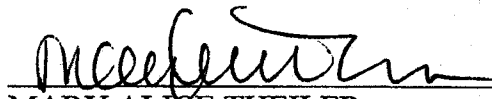
jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States . . . that - has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i). Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. Accordingly, by this Affidavit and Warrant I seek authority for the government to search all of the items specified in Section I, Attachment B (attached hereto and incorporated by reference herein) to the Warrant, and specifically to seize all of the data, documents and records that are identified in Section II to that same Attachment.

Dated this 16 day of February, 2018.



Sara Blond, Affiant
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me this 16 day of February, 2018.



MARY ALICE THEILER
United States Magistrate Judge

ATTACHMENT A
ACCOUNTS TO BE SEARCHED

This warrant applies to information associated with the Facebook user Facebook account 10003841782510 ("SUBJECT ACCOUNT") that is stored at premises owned, maintained, controlled, or operated by Facebook, a company headquartered in Menlo Park, California.

ATTACHMENT B**I. Information to be disclosed by Facebook**

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each SUBJECT ACCOUNT listed in Attachment A:

a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;

b. All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them;

d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

e. All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;

- 1 f. All "check ins" and other location information;
- 2 g. All IP logs, including all records of the IP addresses that logged into the
- 3 account;
- 4 h. All records of the account's usage of the "Like" feature, including all
- 5 Facebook posts and all non-Facebook webpages and content that the user has "liked";
- 6 i. All past and present lists of friends created by the account;
- 7 j. All records of Facebook searches performed by the account;
- 8 k. The length of service (including start date), the types of service utilized by
- 9 the user, and the means and source of any payments associated with the service
- 10 (including any credit card or bank account number);
- 11 l. All privacy settings and other account settings, including privacy settings
- 12 for individual Facebook posts and activities, and all records showing which Facebook
- 13 users have been blocked by the account;
- 14 m. All records pertaining to communications between Facebook and any
- 15 person regarding the user or the user's Facebook account, including contacts with support
- 16 services and records of actions taken.
- 17 n. A list of any accounts linked to the SUBJECT ACCOUNT by machine
- 18 cookie.

19 **II. Information to be seized by the government**

20 All information described above in Section I that constitutes fruits, contraband, evidence
21 and instrumentalities of violations of Title 18, United States Code, Section 1591 (Sex
22 Trafficking of a Juvenile or Through Force, Fraud, and Coercion), including the
23 following:

- 24 a. Any and all Wall Posts, Timeline Posts, private messages, status updates,
- 25 chat history, friend requests, or other information suggesting that AUBREY TAYLOR is
- 26 involved in prostitution, sex trafficking, or witness intimidation or witness tampering;
- 27

1 b. Any and all photographs, including photographs posted by AUBREY
2 TAYLOR or by other persons, suggesting that AUBREY TAYLOR is involved in
3 prostitution, sex trafficking, or witness intimidation or witness tampering;

4 c. Any and all IP logs, including all records of the IP addresses that logged
5 into the account, and the dates and times such logins occurred, suggesting that AUBREY
6 TAYLOR traveled within or outside the Western District of Washington to conduct
7 prostitution or sex trafficking;

8 d. Any and all photographs, including photographs posted by AUBREY
9 TAYLOR or by other persons, suggesting that AUBREY TAYLOR traveled within or
10 outside the Western District of Washington to conduct prostitution or sex trafficking; and

11 e. Any and all Wall Posts, Timeline posts, private messages, status updates,
12 chat history, friend requests, or other information, and any and all photographs, including
13 photographs posted by AUBREY TAYLOR or other persons, suggesting that AUBREY
14 TAYLOR used Facebook to recruit individuals to prostitute for him, or to intimidate or
15 tamper with victims or potential witnesses; and

16 f. Records relating to who created, used, or communicated with the
17 SUBJECT ACCOUNT, including records about their identities and whereabouts.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Facebook, and my official title is _____. I am a custodian of records for Facebook. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Facebook, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;

b. such records were kept in the ordinary course of a regularly conducted business activity of Facebook; and

c. such records were made by Facebook as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.